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March 12, 2015

By ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl St., Rm. 1350
New York, NY 10007

Re: Sternberg v. New York City Health and Hospitals Corp.
14 Civ. 1003 (PAC)

Dear Judge Crotty:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and attorney for the New York City Health and Hospitals Corporation (“HHC” or “defendant”) in the above-referenced action. I write on behalf of the defendant to request a three week-extension of the existing discovery deadlines from March 16, and April 6, respectively, to April 27, 2015. This is the second request for an extension of the discovery deadlines, and plaintiff consents to the request.

The depositions of five fact witnesses have been conducted. Depositions of three further witnesses are scheduled to occur by Tuesday of next week. However, the parties expect that approximately three more depositions of fact witnesses will be necessary. Of these, one non-party witness has already confirmed her appearance, and the parties are conferring to schedule the remaining witnesses.

Should Your Honor grant this request, the existing discovery deadlines would be modified as follows:

Depositions / Fact Discovery to be completed by: April 27, 2015

Expert Discovery to be completed by: June 1, 2015

The parties propose that the case management conference currently scheduled for April 22, 2015 be adjourned to May 4, 2015, or a date convenient to the Court.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Don H. Nguyen

Don H. Nguyen
Assistant Corporation Counsel

cc: (via ECF)
Beranbaum Menken LLP
Attorney for Plaintiff